IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

AY **0 1** 2006

MICHARLE KUNZ, Clerk

CIVIL ACTION NO.

Wells Fargo Teamsters Local 623

06 - 1840

COMPLAINT

UPS and Wells Fargo have established a business relationship called the Consern loan program, the way the program is suppose to work is the employee is to establish a education loan account meanwhile the account is establish with Wells Fargo the Student/UPS Worker should maintain employment with their employer UPS by doing so every year employment is maintained at UPS payment towards the Wells Fargo account.

One year after this program was maintain with Wells Fargo and 39% of the Loans defaulted, They the Bank decided in every effort to discriminate against all the union workers, they are as follows the Labor Workers Union, Maintenance workers Union, and the Pilots Union. You Need to be a super visor to get your loan from Wells Fargo.

The following terms are some that were using to deny the union workers their loans. School does not meet program guidelines. Loan amount does not meet program guidelines. According to good resources from Wells Fargo white collar workers, the Term school does not meet program guidelines means that When you application was precessed the particular loan that was used to Finance your application does not finance that school and you should by default never receive a statement like this on any denial letter. According to UPS documents a third loan was established on the Wells Fargo computer system this particular does not finance any schools and is setup for the error message school does not meet program guidelines and loan amount does not meet program guidelines.

In addition to court proceedings in District court a Mr. Gary Tocci testified on behalf of UPS that consern is a private business, consern is not a creditor, they have no money to loan you, and they don't fund any school the Bank does and consern is not a bank, He also stated that UPS had partnered with the consern loan program, to make leans available for education purposes. The District Justice replied a little bit of Fraud, you did make those loans avialable pointing to the Sallie Mae Loans.

This is clearly an issue of a Financial Assault on all the union workers, The Local Union does not want to get involved according to Mr. Ted Carpino, Representing Local 623 Teamsters

On August 29 2003 two Loan applications were precessed with Wells Fargo both are the same exact same loans after tell the Customer service employee of Wells Fargo, that I was a supervisor of Wells Fargo they had no problem Lending funds to Wilmington College, how ever after telling Well Fargo I was a Package Handler they had problems with lending me money. How Many more loans are like that.

In the software (Web Page)you will find that there are four catorgories/classification of workers, take note all of the Loan Applications from Wells Fargo a.k.a consern loan Program are strickly over the phone there is no physical paper work leaving the full responsibility on the loan processing on Wells Fargo.